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November 25, 2003

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 95-116

Dear Ms Dortch:

On October 14, 2003, representatives of BellSouth met with John Muleta, Chief of the Wireless Telecommunications Bureau ("WTB"), and members of the WTB staff. The purpose of our meeting was to discuss why the Commission needed to conduct a further rulemaking with NANC involvement prior to changing the rule that governs how quickly a wireline carrier must complete those ports of telephone numbers categorized as simple ports. During the meeting, BellSouth committed to responding subsequently to some questions posed by the WTB staff relating to the porting process. This letter contains the requested responses.

- 1) Please provide a copy of the LSR form and identify the fields on the LSR that must be completed correctly to place a valid wireless LNP request?**

The training guide that BellSouth provides to wireless service providers planning to interface with BellSouth on WLNP is posted on the BellSouth WLNP website at:

*<http://www.interconnection.bellsouth.com/products/wireless/wlnp/training.html>
(Click on LSR LENS Student Guide)*

The Local Service Request (LSR) appears on Page 14. The LSR form provides administrative, billing, and contact details. The Administrative Section of the LSR contains specific information pertaining to the service being ordered such as: purchase order number; desired due date; and requisition type. The Bill Section of the LSR provides the Service Provider's billing account information. Page 32 shows the Bill

Section of the LSR. Page 36 shows the LSR Contact Information that the WLNP must provide.

The End User (EU) Information Form is shown on page 40. The EU form contains end user details necessary for provisioning service.

The Number Portability (NP) Form is shown on pages 56-58. The NP form contains the details of the specific numbers to be ported out by BellSouth. The NP form must always be associated with an LSR Form and EU Form.

Please note that all fields on the forms that are bolded are required for WLNP. The documentation contains descriptions of each field.

A copy of the LSR Package (LSR, EU and NP forms) can be found at:

http://www.interconnection.bellsouth.com/products/wireless/wlnp/lsr_forms_package.html.

2) How many of BellSouth's Operation Support Systems, or OSS, would have to be modified if the benchmark interval for completion of a port from a wireline carrier was shortened to less than 4 days? What specific systems would be impacted?

At this time, BellSouth has identified two systems that would definitely require modifications if the porting interval was shortened to less than 4 days. These systems are LNP Gateway and Due Date Calculator (DDC). More detailed analysis would be required to determine if other systems would be impacted

The LNP Gateway interface with the Number Portability Administration Center (NPAC) processes LNP messages between BellSouth and the NPAC, as well as coordinates and tracks LNP messages and service order, as well as LSR and FOC activity. DDC determines service due dates for any service that can be ordered electronically and is used in both the Pre-Order and Firm-Order processes to determine when a service can be delivered.

3) How long would it take BellSouth to implement OSS changes?

BellSouth would need a minimum of 10 months to implement OSS changes once requirements are documented.

- 4) How many LSRs , or what % of LSRs, that BellSouth receives are requests for simple ports? For complex ports?
How many LSRs fallout due to errors?**

The following table summarizes LSR activity in the BellSouth region for September 2003. September 2003 represents a typical month of activity.

Total LSRs Received	14,487
Total LSRs - Mechanized	12,156
Total LSRs - Manual	2,331
Total LSRs Simple Port (No Loop)	11,482
Total LSRs Complex Port (W/ Loop)	3,005
Total Mechanized LSRs (Simple)	9,404
Total Flow Through	5,116
% Flow Through	54.40%
Total Mechanized LSRs (Complex)	2,752
Total Manual W No Errors	329
% Flow Through	11.95%
Total Manual LSRs (Simple)	2,278
Total No Errors	600
% No Errors	26.34%
Total Manual LSRs (Complex)	253
Total No Errors	108
% No Errors	42.69%

- 5) What % of ports does BellSouth put into conflict?**

BellSouth does not have a count of the number of requests to port (*i.e.*, "create SVs") received from the NPAC that BellSouth puts into conflict. To determine this will require a manual effort. BellSouth expects to be able to provide this information shortly.

- 6) Under what circumstances would BST not concur on a port, *i.e.*, put a port in conflict status?**

BellSouth does not concur on a port (*i.e.*, a create SV received from the NPAC) in the following situations:

- There is no matching LSR for the TN associated with the SV.

- The new service provider sends a create SV to the NPAC before BellSouth sends a valid FOC.
- There is a due date discrepancy between the LSR and the create SV.

7) How many of BellSouth's "partners" (service providers who submit LSRs) use electronic submission methods as opposed to fax or manual methods?

For the month of September, 2003:

- 77 CLECs submitted LNP LSRs. Of these 77 CLECs, 53 submitted at least one LSR via FAX.
- Of these 77 CLECs, 28 used FAX submission only.
- 14,191 LNP LSRs were submitted. Approximately 26.02 % of the LSRs submitted were via FAX.

After WLNP is implemented on November 24, 2003, BellSouth is aware of fourteen wireless service providers that will submit at least some of their LNP LSRs electronically. BellSouth expects, however, that, as is the case with wireline service providers, many of the wireless providers will submit LSRs via fax as well as electronically.

8) Why are there two timers (T1 and T2 timers) of 9 business hours in the SV concur process?

There are two timers in the SV concur process as a result of an industry compromise reached during the development of the initial flows for wireline service provider portability in 1997.

The industry could not agree on the proposed flow, which required the "old" service provider to concur before the port of a TN to the "new" service provider could be completed.

One segment of the industry wanted the concur process to be mandatory (mostly ILECs) while another segment of the industry (mostly CLECs) wanted no concur capability at all. "Old" service providers wanted to be sure that the port was valid. "New" service providers were concerned about valid ports being arbitrarily rejected by the "old" service provider because the "old" service provider did not concur.

To resolve the disagreement, the carriers agreed to a process that allows 18 business hours (two nine-hour periods) to concur with the port. If concurrence from the "old" service provider is not received after the 18 hours, the "new" service provider is allowed to proceed with the port. During the 18 hours, the "old" service provider can put a port request into a "conflict" status. After six hours, the "new" service provider can proceed with the port even if the reason for the "conflict" has not been resolved.

Once the issues are resolved the "old" service provider can then concur on the SV and the porting process continues. However the completion of the port does not necessarily require the "old" service provider to concur because after the second timer, NPAC will process the port even if the "old" service provider has not concurred.

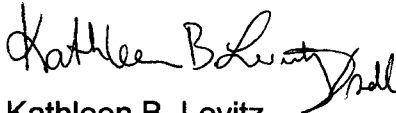
The second timer was added to allow an extra day to resolve issues and to notify the "old" service provider and the "new" service provider of the port. A port can be put into "conflict" status up to 12 hours prior to the due date of the port. As noted in the Meeting Minutes for the 1/22/1997 LNPA Selection Working Group Meeting Minutes which can be found at (<http://www.fcc.gov/wcb/tapd/Nanc/012297mm.html>):

"No due date will be earlier than three (3) business days from the day the Firm Order Commitment (FOC) is generated by the old Service Provider (SP). This represents a compromise by the CLECs as this process allows for an additional day in the flow to resolve issues."

"An old SP may cause a port to be placed into conflict following certain timing parameters, however, the new SP, also following certain timing parameters, has the unilateral right to remove a port from conflict. This is a compromise to the ILECs as they had sought additional control over the process."

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place it in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

cc:	John Muleta	Bill Maher
	Catherine Seidel	Carol Matthey
	Jennifer Tomchin	Josh Swift
	David Furth	Eric Einhorn
	Jared Carlson	Cheryl Callahan